



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

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MEMORANDUM

TO: Philip E. Stutzman, Director of Compliance

FROM: Vicki Rippie, Executive Director

DATE: December 28, 2005

SUBJECT: Complaint Against Nick Federici, Lobbyist

RCW 42.17.150 requires lobbyists, before doing any lobbying, or within thirty days after being employed as a lobbyist, whichever occurs first, to register by filing with the commission a lobbyist registration statement, in such detail as the commission shall prescribe. The required elements of the registration are detailed on PDC form L-1. Each lobbyist who has registered shall file a new registration statement, revised as appropriate, on the second Monday in January of each odd-numbered year, and failure to do so shall terminate his registration.

RCW 42.17.170 requires lobbyists registered under RCW 42.17.150 and any person who lobbies to file with the commission periodic reports of his or her activities signed by the lobbyist. The reports shall be made in the form and manner prescribed by the commission (PDC form L-2). They shall be due monthly and shall be filed within fifteen days after the last day of the calendar month covered by the report.

Summary: Nick Federici has been a registered lobbyist since 1997. At the end of 2004, he was registered and reporting for nine clients. By January 10, 2005, he was required to file a new registration statement, revised as appropriate, for each continuing or new client. By January 10, Mr. Federici had registered for one of his prior year's clients.

Mr. Federici did not timely file a monthly L-2 report for January, and on March 8, 2005, received a warning letter. The letter reminded him that an L-2 report for January was required to be filed by February 15, 2005. The correspondence included the Commission's "Brief Enforcement Penalty Schedule" for lobbyists and urged him to give the matter his immediate attention and to ensure that all future reports were timely filed.

On April 5, 2005, Mr. Federici filed his January, February and March L-2 reports, in time to avoid enforcement for his late-filed February L-2 report.



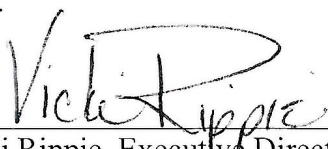
When the three reports were filed, it was noted that the L-2 reports included reportable information for ten clients, even though he had only re-registered for one client. Mr. Federici was contacted by telephone and asked to file the missing lobbyist registrations. When the missing registrations were not filed, he was contacted again and asked to appear at the offices of the Public Disclosure Commission to explain why he had not registered for nine of his clients. At a meeting with PDC staff on September 27, Mr. Federici was told to file the missing lobbyist registrations immediately. On October 20, 2005, eight of the nine registrations were filed 290 days late, and on November 10, the final missing L-1 was filed 311 days late.

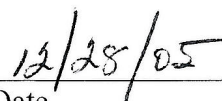
Mr. Federici filed L-2 reports during 2005 for all of his clients, even though he was only registered to lobby for one client. However, most L-2 reports were filed late, even after receiving a warning letter for the late-filed January L-2 report. His L-2 filings for 2005 are summarized below:

Month	Total Compensation & Expenses	Days Late
January	\$ 17,300	49
February	\$ 17,300	21
March	\$ 17,300	0
April	\$ 17,300	35
May	\$ 12,900	5
June	\$ 9,650	26
July	\$ 23,300	0
August	\$ 9,400	12
September	\$ 9,400	46
October	\$ 10,150	17
November		Not Filed
TOTAL	\$ 144,000	0 - 49

Based on this information, I am filing this complaint and directing staff to investigate the allegations that Nick Federici: 1) failed to timely register to lobby for nine of the ten clients which employed him during 2005; and 2) failed to timely file his monthly L-2 expense reports.

Of his ten clients, one registration was timely filed, eight were 290 days late, and one was 311 days late. Of the ten L-2 reports filed for January through October 2005, six were filed more than 15 days late. In addition, the November 2005 L-2 report has not been filed.


Vicki Rippie, Executive Director


Date